

ABMS OBJECTIVES AND TARGETS

ISWARABENA SDN BHD

No.	Category	Strategy	Objectives	Action Plans	Targets
1.	T TOP LEVEL COMMITMENT	Clear Direction from the Top showing commitment toward Bribery Free Environment	Set Direction and Review Performance	1. Establish ABMS 2. Sign Director's Pledge 3. Establish ABMS Policy 4. Establish No Gift Policy 5. Establish Whistle Blowing Policy 6. Practice Non-Partisan policy towards any investigation of the Bribery cases 7. Review the Performance of ABMS once a year	1. Organize one / year Top Management engagement with the employee where among others commitment towards Bribery Free Environment is reiterated 2. Review the performance of the ABMS once a year
2.	R RISK ASSESSMENT	Clear and Comprehensive Bribery Risk Assessment covering all relevant processes.	Conduct and Review Bribery Risk Assessment	1. Conduct Bribery Risk Assessment Workshop 2. Establish Bribery Risk Management covering all processes within ISB 3. Review Risk Register yearly or after every detected bribery cases	1. Establish Complete Risk Register By End March 2023 2. Review Risk Register yearly / upon detection and investigation of bribery cases.
3.	U UNDERTAKE CONTROL MEASURES	Implement all identified control measures in the Bribery Risks Assessment, Anti Bribery Manual and Whistle Blowing Manual	Implement identified control measures and prompt investigation of bribery cases.	1. Implement Identified Control Measures identified in the Bribery Risk Assessment, Anti Bribery Manual and related procedures	1. Score of at least 80 % in the Bribery Score Checklist completed during the internal audit 2. Investigation related to bribery occurrences shall be commenced within 24 hours of the detection.
4.	S SYSTEMIC REVIEW, MONITORING AND ASSESSMENT	Conduct review , monitoring and assessment to gauge the compliance and effectiveness of the ABMS.	Implement audit and review as per the determined intervals / frequency	1. Conduct Analysis on the ABMS performance 2. Conduct Internal Audit 3. Conduct Top Management Review 4. Conduct Compliance Function Review 5. Conduct Governing Body Review	1. Top Management Review Once a year 2. Governing Body shall review ABMS achievement and Bribery Cases during once a year 3. Compliance Function shall conduct yearly review on the ABMS performance.
5.	T TRAINING AND COMMUNICATION	Bribery Free Culture and Education	Instill culture in the organization towards free bribery.	1. Implement bribery prevention mechanism i.e. due diligence in high risk processes such as tender, purchasing and procurement, human resource. 2. Establish and implement policies-gift policy etc. 3. Educate employees on the Anti Bribery Initiatives 4. Communicate to the Business Associates on the Anti Bribery Initiatives	1. 100% employees attend Anti Bribery Awareness programme 2. 100% Business Associates were communicated with ISB's ABMS initiatives

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Representing Governing Body
Board of Directors

RUZIANA BINTI KARIM
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